

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the matter of	)	
	)	
Revision of the Commission's Rules To	)	
Ensure Compatibility with Enhanced 911	)	WT Docket No. 03-76
Emergency Calling Systems	)	
	)	

**Western Wireless Corporation  
Public Safety Answering Point ("PSAP") Certification**

Western Wireless Corporation ("Western"), on behalf of its subsidiaries, WWC Holding Co., Inc., WWC License L.L.C., and WWC Texas RSA Limited Partnership, and pursuant to the Federal Communications Commission's ("FCC") *City of Richardson, Texas Order on Reconsideration* ("Richardson Order") hereby submits its Public Safety Answering Point ("PSAP") certification for PSAPs that have requested delivery of enhanced 911 ("E911") service from it, but are incapable of receiving and/or utilizing the service.<sup>1</sup>

**I. Introduction**

Western is engaged in deploying enhanced 911 service throughout many counties in the western United States. During the course of its deployment efforts Western has undertaken discussions with each of its requesting PSAPs to make a determination and assessment of the PSAP's readiness and overall

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<sup>1</sup> Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, *Order on Reconsideration*, rel. Nov. 26, 2002 (*City of Richardson*).

capabilities for receiving and utilizing wireless E911 service. In some instances, Western has determined that the PSAP is incapable of either receiving or utilizing the E911 service. According to the Commission's E911 rules, a PSAP must be able to receive and utilize the E911 service in order for that PSAP's request to be valid. In instances where Western's deployment efforts and discussions with the PSAPs have lead it to a conclusion that the PSAP is not ready to receive the service, Western has notified the PSAP of its conclusion and deemed the request for service to be invalid.

## **II. Deployment**

Western has been engaged in deployment efforts for certain PSAP requests that, for reasons outside of Western's control, have been prevented from being deploying within the Commission's required timeframe. Western's attempts to deploy service to the identified PSAPs have been frustrated because of PSAP or LEC problems that have prevented Western from completing its deployments. Pursuant to the guidelines established in the Richardson Order, Western has determined that the pending requests for service from ten PSAPs are invalid because the PSAP is incapable of receiving or using the service and therefore the requests do not satisfy the Commission's rules for a valid request.

A list of the PSAPs Western has determined to have invalid requests for service pending longer than six months is attached in Attachment A. The identified PSAPs are in Kansas, Montana, Nebraska, North Dakota, South Dakota and Texas. The PSAPs do not satisfy the Commission's rules for valid requests for service because of PSAP equipment problems, LEC connectivity problems, the PSAP's desire for postponement of deployment, and the PSAP's

unwillingness to participate in the deployment process because of PSAP personnel changes.

### **III. PSAP Assessment**

Western has attempted to work with the PSAPs to resolve any problems preventing the deployment process from moving forward, however, for reasons outside of its control, the identified PSAPs are still unable to receive and utilize the service. Pursuant to the rules established in the Richardson Order, Western has notified the PSAPs that Western has deemed their request to be invalid. In Attachment B are copies of the correspondence that Western has had with the PSAPs regarding the deployment problems and Western's assessment of their capabilities. The letters detail Western's extensive efforts to fully understand and assess the PSAP's capabilities.

Only after making a determination that the PSAP's level of readiness make it incapable of receiving and utilizing service did Western notify the PSAP that its request was invalid and that Western would no longer be continuing its efforts to deploy service to the PSAP.

### **IV. Conclusion**

In accordance with Commission rules, Western seeks to have the identified PSAPs' requests certified as invalid by the Commission. Discussions and deployment efforts in these counties have led Western to a conclusion that the PSAPs' requests are invalid because they are not capable of receiving and/or utilizing the service Western is attempting to deliver to them. A signed and notarized Affidavit support this certification report is attached in Attachment C

## **Attachment A**

## **Attachment B**

## **Attachment C**